

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 4:22-CR-612
	§	
TOM COOPERMAN	§	

MOTION FOR RETURN OF PASSPORT AND RELEASE OF BOND

TO THE HONORABLE JUDGE ANDREW S. HANEN:

COMES NOW, Tom Cooperman by and through his attorney and requests this Court to order the return of Mr. Cooperman’s United States Passport and release of his appearance bond. For good cause, Mr. Cooperman would show the Court as follows:

I.

On March 20, 2024, this Court granted a Second Joint Motion to Dismiss to Superseding Indictment acknowledging that the “Indictment is defective for failing to state an offense and much be dismissed without prejudice...”¹

II.

Mr. Cooperman’s United States Passport was collected upon his release on bond and is currently being held in the custody of the United States Pretrial Services Office. Now that Mr. Cooperman’s case has been dismissed, he requests the return

¹ See Doc No. 628.

of his passport.

III.

Additionally, Mr. Cooperman paid a secured bond in the amount of \$100,000 on January 9, 2024.² Now that Mr. Cooperman's case has been dismissed, he requests the security be released.

WHEREFORE PREMISES CONSIDERED, Mr. Cooperman respectfully request this Court order Pretrial Services to return his United States passport and that his appearance bond of \$100,000 be released.

Respectfully Submitted,

/s/ Chip Lewis
Chip Lewis
Federal ID#24313
1207 S. Shepherd Dr.
Houston, Texas 77019
Telephone: (713) 523-7878
chip@chiplewislaw.com

² See Doc No. 95.

CERTIFICATE OF CONFERENCE

I hereby certify that I have spoken with AUSA Scott Armstrong and the Government is opposed to this Motion.

/s/Chip Lewis_____
CHIP LEWIS

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of March 2024, a true and correct copy of the foregoing Motion was delivered to the Government via email.

/s/Chip Lewis_____
CHIP LEWIS